

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

COREY DONOVAN

NO. 1:21-CR-00088-JL

STATUS REPORT OF COUNSEL RE:
DEFENDANT'S PRO SE MOTION TO RETURN PROPERTY

Now comes counsel for the defendant, Donna J. Brown, and hereby submits this status report pursuant to this Court's Order of January 10, 2025.

Undersigned counsel filed a status report on April 10, 2025 and will not repeat the background and facts set forth in that pleading. In that pleading, the Government sent an email and an attachment to undersigned counsel that detailed their efforts to investigate the issues raised in the defendant's pro se motion. The Government indicated that they have reached out to the investigator in the case and are still waiting to hear back from the investigating agent regarding this issue.

On May 16, 2025, undersigned counsel emailed counsel for the Government, Charles L. Rombeau, inquiring about an update on discovery that is the subject of the defendant's pro se motion. Attorney Rombeau has not responded to that inquiry as of the filing of this pleading. Therefore, undersigned counsel respectfully requests this Court extend the deadline in this matter for an additional 30 days and defer ruling on the motion to return property.

Respectfully submitted,

Corey Donovan

By His Attorney,

Date: May 16, 2025

/s/ Donna J. Brown
Donna J. Brown
N.H. Bar No. 387
Wadleigh, Starr & Peters
95 Market St
Manchester, NH 03101
Tel. (603) 669-4140
E-mail: dbrown@wadleighlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2025, the above notice was served electronically through CM/ECF upon all counsel of record.

/s/ Donna J. Brown
Donna J. Brown #387